

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Revision of the Commission's Rules To)	
Ensure Compatibility with Enhanced 911)	CC Docket No. 94-102
Emergency Calling Systems)	
)	
Request for Waiver By Southern)	
Communications Services d/b/a)	
SouthernLINC Wireless)	

To: The Commission

SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:

AUGUST 1, 2008

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Dated: August 1, 2008

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**SOUTHERNLINC WIRELESS E911 PHASE II QUARTERLY REPORT:
AUGUST 1, 2008**

Pursuant to the *Order* of the Federal Communications Commission ("FCC" or "Commission") of February 15, 2008,¹ Southern Communications Services, Inc. d/b/a SouthernLINC Wireless ("SouthernLINC Wireless") hereby provides the Commission its quarterly report regarding the status of its efforts to achieve ninety-five percent penetration of automatic location identification (ALI)-capable handsets among its subscribers pursuant to Section 20.18(g)(1)(v) of the Commission's Rules, 47 C.F.R. § 20.18(g)(1)(v).

¹ / *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Further Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, Order, DA 08-406 (rel. Feb. 15, 2008) ("2008 Order") (granting SouthernLINC Wireless until August 15, 2008, to achieve ninety-five percent penetration of location-capable handsets among its subscriber base and requiring the filing of quarterly status reports).

I. BACKGROUND

On July 26, 2005, SouthernLINC Wireless, a “qualified Tier III carrier” as that term is defined in Section 107 of the *ENHANCE 911 Act*,² submitted a Request for Waiver seeking a limited extension of the Commission’s December 31, 2005, handset deployment deadline to allow SouthernLINC Wireless an additional twenty-four months to achieve ninety-five percent penetration of location-capable handsets among its subscriber base.³ As set forth in the Request for Waiver and subsequent filings, SouthernLINC Wireless has faced numerous challenges in its efforts to achieve the required level of penetration of location-capable handsets, including (i) a latent software defect in the Motorola A-GPS-equipped handsets used by SouthernLINC Wireless subscribers that rendered all A-GPS services in these handsets unusable for E911 location in July 2004; (ii) the substantial portion of handsets assigned to enterprise or government accounts that typically have long-term equipment replacement cycles and are both reluctant and resistant to upgrading from their current handsets to new location-capable handsets; and (iii) the number of SouthernLINC Wireless subscribers who utilize and rely on the range and coverage of higher-power 1 watt and 3 watt phones and who are unwilling to upgrade to a lower-power (0.6 watt) location-capable handset, which could decrease their ability to receive any communications services – including emergency services – in remote areas.⁴

² / National Telecommunications and Information Administration Organization Act – Amendment, Publ. L. No. 108-494, 118 Stat. 3986 (1994) (“*ENHANCE 911 Act*”).

³ / Request for Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 26, 2005 (“Request for Waiver”).

⁴ / See, e.g., Request for Waiver at 2 – 3; See also SouthernLINC Wireless Notice of *Ex Parte* Presentation, CC Docket No. 94-102, filed September 9, 2005; SouthernLINC Wireless Response to Request for Additional Information Supporting its Request for

On November 3, 2005, the Commission granted SouthernLINC Wireless a limited ten-month extension of the ninety-five percent handset penetration deadline and required SouthernLINC Wireless to file status reports on a quarterly basis.⁵ On December 5, 2005, SouthernLINC Wireless filed a Petition for Reconsideration and Clarification of the *2005 Order*.⁶ This Petition is still pending before the Commission, and SouthernLINC Wireless clarifies that all subsequent filings it has made in this docket – including the instant Quarterly Report – have been submitted separate from and without prejudice to its pending Petition.

On July 24, 2006, SouthernLINC Wireless filed its first Request for Further Waiver, seeking an additional extension of the ninety-five percent penetration deadline until December 31, 2007.⁷ On October 20, 2006, SouthernLINC Wireless submitted a request to the Commission for leave to withdraw without prejudice its Request for Further Waiver so that it could provide the Commission with additional relevant information on SouthernLINC Wireless' compliance efforts.⁸

Waiver of the E911 Phase II Handset Deployment Deadline, CC Docket No. 94-102, filed Oct. 26, 2005 (“Supplemental Filing”).

⁵ / *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, Order, FCC 05-188 (rel. Nov. 3, 2005) (“*2005 Order*”) (granting SouthernLINC Wireless until November 3, 2006, to achieve ninety-five percent penetration of location-capable handsets among its subscriber base and imposing certain conditions on the grant of waiver).

⁶ / Petition for Reconsideration and Clarification of SouthernLINC Wireless, CC Docket No. 94-102, filed December 5, 2005 (“Petition”).

⁷ / Request for Further Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 24, 2006 (this Request was subsequently withdrawn).

⁸ / See SouthernLINC Wireless Request for Further Waiver of Section 20.18(g)(1)(v) of the Commission's Rules, CC Docket No. 94-102, filed Oct. 20, 2006.

On November 2, 2006, SouthernLINC Wireless filed its revised Request for Further Waiver.⁹ On February 12, 2007, the Commission granted SouthernLINC Wireless a limited extension until November 12, 2007, of the ninety-five percent handset penetration deadline.¹⁰ Since then, SouthernLINC Wireless has made substantial progress toward the 95 percent benchmark, and the Commission granted a further limited extension until August 15, 2008, and required SouthernLINC Wireless to continue to file status reports on a quarterly basis.¹¹ However, because it is still slightly short of that goal, SouthernLINC Wireless found it necessary to file a Request on July 18, 2008, for a Limited Waiver of the Commission's handset penetration deadline.¹²

II. INFORMATION REGARDING THE STATUS OF SOUTHERNLINC WIRELESS' E911 PHASE II DEPLOYMENT EFFORTS

In accordance with the *2008 Order*,¹³ SouthernLINC Wireless provides the Commission with the following information regarding its E911 Phase II deployment status and efforts.

A. Number and Status of Phase II Requests from PSAPs

As of July 31, 2008, SouthernLINC Wireless had received 172 requests for Phase II service out of a total of 302 PSAPs in its service territory. SouthernLINC Wireless has completed deployment in response to 165 of these requests, with 7 requests still pending.

⁹ / Request for Further Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed November 2, 2006 ("Request for Further Waiver").

¹⁰ / *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Further Waiver by Southern Communications Services, Inc. d/b/a SouthernLINC Wireless*, CC Docket No. 94-102, Order, DA 07-659 (rel. Feb. 12, 2007).

¹¹ / *See 2008 Order*.

¹² / Request for Limited Waiver by SouthernLINC Wireless, CC Docket No. 94-102, filed July 18, 2008 ("2008 Request for Limited Waiver").

¹³ / *2008 Order* at ¶ 15.

None of the pending requests for Phase II service have extended past the Commission's six-month deployment deadline. In all cases, SouthernLINC Wireless remains in regular communication with PSAPs regarding Phase I and Phase II deployment and stands ready to take whatever steps it can to ensure that enhanced 911 services are made available as expeditiously as possible.

A chart summarizing SouthernLINC Wireless' deployment of E911 Phase I and Phase II service to PSAPs is provided as Attachment A. Pending Phase I and Phase II requests are detailed in the chart enclosed as Attachment B.

Because SouthernLINC Wireless has chosen to deploy a handset-based solution to provide caller location data to PSAPs, it is currently capable of providing E911 Phase II service to any and all Phase II-capable PSAPs in its service territory.

B. Estimated Dates on Which Phase II Service Will Be Available to PSAPs Served by SouthernLINC Wireless' Network

As described above, SouthernLINC Wireless is capable of providing Phase II service to any requesting Phase II-capable PSAP in its service territory. Estimated deployment dates for pending Phase I and Phase II requests are provided in the chart enclosed as Attachment B.

C. Status of Coordination Efforts With PSAPs for Alternative Handset Penetration Dates

SouthernLINC Wireless remains in constant communication with all PSAPs in its territory regarding E-911 services, its ability to provide Phase I and Phase II services, and any problems that may arise that affect service availability. These communications may be written or verbal, and they include information on SouthernLINC Wireless' ability to provide Phase II service to its customers and the degree to which its customers can benefit from Phase II capabilities. SouthernLINC Wireless' 911 services coordinator

interacts with the 911 community on a regular basis, including attending meetings where she provides verbal updates on SouthernLINC Wireless' Phase II deployment status. Depending on the nature of the meeting, such information may be provided to all attendees in the form of a general announcement or may be targeted to interested parties in specific discussions. Since the submission of SouthernLINC Wireless' 2nd Quarter 2008 Report,¹⁴ the 911 services coordinator has provided updates at the Alabama Northwest 911 Directors Meeting (May 14, 2008) and the Alabama NENA Quarterly Meeting (July 24, 2008), as well as through telephone conversations and face-to-face interactions with PSAP representatives as Phase II deployments are completed.

As described in its previous quarterly status reports, SouthernLINC Wireless has undertaken a communications program for Phase II-capable PSAPs in its service territory focusing on the customer handset penetration issue.¹⁵ Specifically, SouthernLINC Wireless is providing these PSAPs with regular updates every two months via U.S. mail on the number of SouthernLINC Wireless customers using location-capable handsets and its progress towards the goal of ninety-five percent penetration of location-capable handsets. The most recent of these written updates was sent to PSAPs on June 27, 2008.

In addition, SouthernLINC Wireless always provides PSAPs with written confirmation of Phase II implementation once all activities, including testing, have been completed. These communications also include information on the number of SouthernLINC Wireless customers using location-capable handsets and its progress

¹⁴ / SouthernLINC Wireless E911 Phase II Quarterly Report: May 1, 2008, CC Docket No. 94-102, filed May 1, 2008 ("2nd Quarter 2008 Report").

¹⁵ / *See, e.g., Id.* at 6.

towards the ninety-five percent penetration goal. These PSAPs will also receive the regular mail updates described above.

D. Efforts to Encourage Subscribers to Upgrade to Location-Capable Handsets

As described in its previous quarterly reports and other filings with the Commission, SouthernLINC Wireless has undertaken extraordinary efforts at significant expense to encourage subscribers to upgrade to location-capable handsets, including multiple large-scale customer outreach campaigns (consisting of direct mail, customer calling, and text message campaigns, as well as customer site visits and booths at conferences and public events), offers of free minutes and free services, and an aggressive program offering customers with non-location capable handsets a free replacement phone with no additional contract requirements.¹⁶

To communicate with customers about E-911 services and capabilities, SouthernLINC Wireless launched a twice-quarterly bill message communications plan in 2006 to provide information to its customers about E-911 and has continued this program through 2007 and into 2008.¹⁷ This bill message is designed to draw customers' attention to the issue of wireless E-911 service – as well as the need for an A-GPS-capable phone – and send them to a dedicated area on the SouthernLINC Wireless website for more details on E-911 services, including the availability of basic, Phase I, and Phase II services across SouthernLINC Wireless' service territory and information on which

¹⁶ / See, e.g., 2nd Quarter 2008 Report at 7 – 14 (and the filings cited therein); See also Request for Further Waiver by SouthernLINC Wireless, CC Docket 94-102, filed Nov. 9, 2007 at 17 – 20 and Attachments E through I.

¹⁷ / See, e.g., SouthernLINC Wireless E911 Phase II Quarterly Report: November 1, 2007, CC Docket No. 94-102, filed Nov. 1, 2007 (“4th Quarter Report”) at 7 and Attachment C (providing the text of the bill message).

handset models are location-capable. This section of the website was launched in early February 2006.¹⁸

SouthernLINC Wireless is continuing its efforts to reach customers who do not have location-capable phones. SouthernLINC Wireless' offer to these customers of a free phone with no contract extension remains ongoing – as does its offer to these customers to upgrade to any other phone model at the current promotional price for the phone¹⁹ and without being subject to any additional contract terms – and SouthernLINC Wireless sales and customer service personnel have been instructed to continue extending these offers whenever they interact with customers. Currently, customers can select from two phone models for free with no contract extension.

Finally, as the Commission is aware, many of SouthernLINC Wireless' customers continue to rely on higher power handsets that are not A-GPS-capable. These customers include public safety, government, and utility subscribers who must often work in challenging environments and remote areas, as well as other subscribers who travel through or operate in remote areas where the coverage of lower power handsets is perceived as insufficient. There continues to be a concern among such subscribers that the lower power capability of location-capable handsets could result in the inability to communicate from areas that can currently be reached by their existing higher power handsets, thus rendering them without access to any emergency services in these areas whatsoever.²⁰

¹⁸ / See <http://www.southernlinc.com/customersupport/e911.asp>.

¹⁹ / Currently, SouthernLINC Wireless' promotional prices include one free handset model (with a mail-in rebate), six different handset models ranging from \$10 to \$60, and the BlackBerry 7100i for only \$160.

²⁰ / See Section 107 of the *ENHANCE 911 Act*.

The reliance these customers have on their current high power handsets has had a significant effect on SouthernLINC Wireless' ability to increase the level of penetration of location-capable handsets among its overall subscriber base. In fact, if some or all of these customers were to be excluded for purposes of determining compliance with Section 20.18(g)(1)(v) of the Commission's Rules, SouthernLINC Wireless would have already exceeded the ninety-five percent penetration level.

Although SouthernLINC Wireless was successful in converting a number of these customers to lower power location-capable handsets, the pace of customer transition away from higher power handsets has slowed considerably, and SouthernLINC Wireless has encountered strong resistance from subscribers who do not want to trade in their high power handsets. There is currently no high power A-GPS handset available. However, as described in its 2008 Request for Limited Waiver, Motorola informed SouthernLINC Wireless in late 2007 that it plans to produce a new A-GPS-capable 1 watt handset.²¹ SouthernLINC Wireless has since been working with Motorola on this new handset and is optimistic that it will be able to offer the new handset to its customers in early 2009, if plans proceed according to the current schedule. SouthernLINC Wireless expects that this new handset should be viewed as an acceptable replacement for the current 1 watt unit and that its customers will be willing to upgrade to this new A-GPS-capable equipment.

SouthernLINC Wireless has been evaluating additional outreach efforts specifically targeting certain subscribers with high power handsets to persuade them to switch to new, lower power location-capable handsets. However, SouthernLINC

²¹ / 2008 Request for Limited Waiver at 14 – 15 and 20 – 22.

Wireless must also take great care that any such program does not result in decreased access to emergency communications for customers accepting upgrades. Accordingly, SouthernLINC Wireless has to ensure that it strikes the appropriate balance between the important, yet competing, public interest needs of increased location capability on the one hand and maintaining access to emergency communications services on the other.

E. Percentage of Customers With Location-Capable Handsets

Approximately 94.85 percent of SouthernLINC Wireless customers currently use location-capable handsets.

F. Status in Achieving Compliance

Although SouthernLINC Wireless faces numerous challenges in its efforts to achieve ninety-five percent penetration of location-capable handsets among its subscribers, it is committed to achieving full compliance as quickly as possible and has made significant progress towards this goal. As a result of the variety of outreach, promotional, and marketing efforts it has undertaken, SouthernLINC Wireless has succeeded in increasing its level of penetration of location-capable handsets to approximately 94.85 percent as of July 28, 2008.

Many of SouthernLINC Wireless' compliance efforts compare favorably to the efforts of other Tier III carriers cited in previous Commission Orders.²² As described in Part D of this Report above and in SouthernLINC Wireless' previous quarterly reports and filings, these efforts have included customer calling and direct-mail campaigns, text

²² / See, e.g., *Request for Waiver of Location-Capable Handset Penetration Deadline by Sprint Nextel Corporation*, WT Docket No. 05-286, Order, 22 FCC Rcd 400, 411-12 ¶ 32 (2007) ("*Sprint Nextel Waiver Order*") (favorably citing examples of efforts by Tier III carriers, including free and discounted phones, free minutes, free service, customer calling campaigns, etc.).

messaging campaigns, direct customer outreach programs, numerous offers of free phones and heavily discounted phones, rebates, free accessories, and offers of free service (including free minutes, a month of free location/navigation services, and a month of free data/Internet access service).

In June 2007, SouthernLINC Wireless launched a targeted program, which is still ongoing, offering free A-GPS-capable phones to customers believed to be using non-location-capable phones without any contract requirements. In order to make this program even more attractive – and thus provide even greater incentive for these customers to upgrade their phones²³ – SouthernLINC Wireless offered these customers a choice from among four different location-capable phone models with a variety of features and capabilities. This array allowed customers to select a free replacement phone that most closely suited their service and usage needs and which most closely matched the features and capabilities they enjoy in their current phones (or that they wish their current phone provided) – an approach intended to increase the likelihood that customers would be willing to replace their non-location-capable handset with a new A-GPS-capable handset. If a customer using a non-location-capable phone preferred to upgrade to a model other than one of the four free models described above, the customer could do so by paying the current promotional price for that phone and would not be

²³ / As SouthernLINC Wireless described in its initial Request for Waiver, its efforts to restore location-capability to customers in the wake of the July 2004 A-GPS software defect included an offer to government customers of a free replacement phone furnished directly by Motorola with no strings attached. However, fewer than one percent of SouthernLINC Wireless' eligible customers chose to take advantage of this offer. *See* Request for Waiver at 21 – 22. Because this illustrated that the decision to replace or upgrade a handset was not necessarily a question of handset cost or contract commitment, SouthernLINC Wireless felt it necessary at the time to spread its limited resources across additional programs as well, such as customer outreach and customer education regarding E911 and the advantages of A-GPS capability.

subject to any additional contract terms. As discussed above in Part D of this Report, SouthernLINC Wireless is continuing to offer a free location-capable phone with no contract extension to those customers still using older, non-location capable phones.

SouthernLINC Wireless also undertook an aggressive, multi-stage customer outreach program to advertise its free phone offer. As described in more detail in its previous quarterly reports, this program involved text messages, direct calling, and direct mail to customers that have been identified as having non-compliant phones, as well as window displays and brochures in its retail stores.²⁴ Customers have been able to take advantage of the free phone offer by contacting the SouthernLINC Wireless Customer Support Organization to receive their free phones by mail, or they can visit a SouthernLINC Wireless retail store to obtain their free phones.

The effectiveness of SouthernLINC Wireless' aggressive compliance efforts is demonstrated by the fact that these efforts have been successful in reaching nearly every SouthernLINC Wireless customer who is not operating with a high power handset, resulting in a penetration level among non-high power subscribers of 98.5 percent. However, as the Commission itself has acknowledged, there are certain customers who will be unwilling to change their handsets regardless of the incentives that are offered.²⁵ While it will continue to be difficult to convince this very last segment to switch, SouthernLINC Wireless will nevertheless continue to try to reach this portion of its

²⁴ / See, e.g., 2nd Quarter 2008 Report at 8 – 10.

²⁵ / See *Revision to the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Third Report and Order, 14 FCC Rcd 17388, 17412-14 ¶¶ 51, 54 (1999) ("We recognize that carriers do not have complete control over their customers' handset choices ... and that it will likely be impossible to literally achieve 100 percent penetration of ALI-capable handsets, since some subscribers may simply choose to keep their non-ALI handsets.").

customer base. For example, as discussed above, SouthernLINC Wireless will continue to offer these customers a free or discounted phone with no contract renewal or extension requirement.

SouthernLINC Wireless believes that it will be able to achieve the ninety-five percent penetration level and will continue to put forth substantial effort and resources into doing so. However, while SouthernLINC Wireless has made substantial progress and has achieved 94.85 percent penetration of location-capable handsets among its entire subscriber base as of the date of this Report, SouthernLINC Wireless does not believe that it will be able to achieve ninety-five percent penetration by its compliance deadline of August 15, 2008, and has therefore filed a request for a limited waiver of this deadline.

As described in its Request for Limited Waiver, SouthernLINC Wireless' difficulty in achieving ninety-five percent penetration is due in large part to the number of customers who rely on higher power handsets for access to communications services in areas where lower power (0.6 watt) A-GPS capable handsets are unable to provide coverage.²⁶ In July 2008, following substantial analysis and notification to the affected subscribers, SouthernLINC Wireless deactivated service to a group of high power handsets belonging to its affiliated electric utility operating companies that had not been utilized in over six months. As a result, SouthernLINC Wireless experienced a marginal decrease in the percentage of customers using high power handsets, along with a small uptick in its overall handset penetration level from 94.65 percent to 94.85 percent. However, SouthernLINC Wireless emphasizes that the deactivation of these handsets was expressly limited to only those handsets used by its affiliates and was undertaken only

²⁶ / See 2008 Request for Limited Waiver at 2 – 3 and 9 – 13.

after a determination had been made – based upon considerable deliberation – that it would not have any adverse effect on the safety of the subscribers or of the public. SouthernLINC Wireless would therefore be extremely reluctant to deactivate any more high power handsets on its system, particularly those used by customers who are not affiliates of SouthernLINC Wireless.

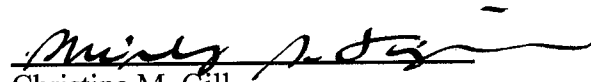
Nevertheless, with the expected introduction of a new, A-GPS capable high power handset in early 2009, SouthernLINC Wireless will have a reasonable option to reach its high power subscribers with a viable replacement that will provide them the benefits of location capability without requiring that they sacrifice the benefits of range and coverage that they depend on. SouthernLINC Wireless will also continue to develop additional outreach programs specifically targeting certain subscribers with high power handsets to persuade them to switch to new, lower power location-capable handsets (where doing so would not diminish their access to emergency services), but it cannot predict as of the filing of this Report what impact these programs may have on the level of penetration of location-capable handsets among SouthernLINC Wireless' overall subscriber base.

III. CONCLUSION

As demonstrated above, SouthernLINC Wireless is continuing to put forth substantial effort and resources into migrating as much of its subscriber base as possible to location-capable handsets, and it is committed to achieving full compliance with the Commission's handset penetration requirement as quickly as possible.

Respectfully submitted,

SOUTHERNLINC WIRELESS



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Dated: August 1, 2008

ATTACHMENT A

E911 Phase I and Phase II Deployment to PSAPs

Legal External Affairs
Project Status Report

E911 Phase I and II Deployments



SouthernLINC Wireless External Affairs
Project Update

Last Reviewed: 7/31/2008

911 Deployments

911 Deployments											
Status as of July 31, 2008		Phase 1 Requests					Phase 2 Requests				
	Total PSAPs	Total Rec'd	Total Pending	Total Deployed	2008 Deployments	Total Past Deployment Deadline	Total Rec'd	Total Pending	Total Deployed	2008 Deployments	Total Past Deployment Deadline
911 Implementation											
AL	85	77	0	77	3	0	66	0	66	12	0
FL	12	11	0	11	0	0	10	0	10	0	0
GA	180	111	1	110	4	0	89	6	83	15	0
MS	25	11	0	11	0	0	7	1	6	0	0
Total	302	210	1	209	7	0	172	7	165	27	0

ATTACHMENT B

Status of Pending E911 Phase I and Phase II Requests

SouthernLINC Wireless
E911 Phase 1 and 2 Deployment Schedule

Phase 1 Sites

First Name	Last Name	Work Phone	PSAP Name	P1 6 Mo Deployment Due Date	P1 Deployment Scheduled Date
Kelly	Barnard	(912) 489-1661	Evans County GA 911	15-Jan-08	TBD

Phase 2 Sites

First Name	Last Name	Work Phone	PSAP Name	P2 6 Mo Deployment Due Date	P2 Deployment Scheduled Date
Dwayne	Harrington	(478) 982-2750	Jenkins County GA 911	09-Nov-08	TBD
Billy	Thurman	(706) 344-3666	Dawson County GA 911	21-Nov-08	TBD
Ann	Walters	(706) 370-4911	Whitfield County GA 911	03-Dec-08	TBD
John	Mott	(601) 482-9854	Lauderdale County MS 911	06-Dec-08	TBD
Bill	Crew	(706) 342-1200	Morgan County GA 911	12-Dec-08	TBD
Cortney	Taylor	(706) 602-0911	Gordon County GA 911	18-Dec-08	TBD
Daisy	McClin	(706) 444-1283	Hancock County GA 911	27-Dec-08	TBD